

Steven T. Wax, OSB No. 85012
Federal Public Defender
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524
Email: steve_wax@fd.org

Lawrence Matasar, OSB No. 74209
621 SW Morrison Street, Suite #1025
Portland, OR 97205
Tel: (503) 222-9830
Email: larry@pdxlaw.com

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008 HO

**DEFENDANT'S INITIAL POTENTIAL
EXHIBIT LIST AND MOTION FOR
FURTHER DISCLOSURE FROM THE
GOVERNMENT**

Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence Matasar

and Federal Public Defender Steven T. Wax, hereby submits the following list of potential exhibits. Mr. Sedaghaty cautions the government in its trial preparation that, at this time, this is only a potential list. He has not fully concluded his investigation and may well add or delete exhibits. If, and when, he determines that additional exhibits will be offered, he will submit a supplemental potential list. In addition, Mr. Sedaghaty notes that he has not included in this list all documents whose potential use is solely for cross-examination purposes and whose disclosure would materially harm his trial rights.

Mr. Sedaghaty further notes that it is his understanding that the government has only provided on its exhibit list items it intends to introduce in its “case in chief.” What constitutes a defendant’s “case in chief” is unclear. In some cases it could involve alibi or affirmative defense evidence. In most criminal cases, including this one, much of what the defense does is rebuttal or impeachment of the government’s case. Thus, much of what Mr. Sedaghaty is providing here is in the nature of rebuttal and impeachment. As a result, the government should be directed at this time to provide the exhibits it has identified and is contemplating using in a rebuttal case. Through this pleading, Mr. Sedaghaty seeks an order directing the government to do so.

An order requiring the government to provide its anticipated rebuttal and impeachment evidence is necessary due to the limitations on the Court’s authority as set out in *United States v. Hicks*, 103 F.3d 837, 841 (9th Cir. 1996). See *United States v. W.R. Grace*, 526 F.3d 499 (9th Cir. 2008) (overruling that portion of *Hicks* holding that the Court could not order the government to disclose witness lists). In light of *Hicks* and *Grace*, *Wardius v. Oregon*, 412 U.S. 470 (1973) (a statute that does not provide for

reciprocal discovery denies due process) requires that the government be required to disclose rebuttal and impeachment exhibit lists as well. Any lesser requirement imposed by the Court, in the face of its order to the defense, violates due process.

Exhibit No.	Description
601	Constitution of Al Haramain Islamic Foundation (Saudi Arabia)
602(A)	Monthly Report and Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation
602(B)	Signed Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation
602(C)	Statement of Purpose and Declaration of Cooperation between Qu'ran Foundation and Al Haramain Islamic Foundation with printed signatures Solimon Al Buthe, Abu Yunus, Dawood Rodgers, and Robert L. Brown
603	Letter March 31, 1998, Qu'ran Foundation to Al Haramain Foundation
604	Email December 11, 1999, Abdul Qaadir to Qur'an and Sunnah Net Group; Jeddah-Net@muslimsonline.com
605	Email December 31, 1999, 10:29 a.m., Al Buthe to Pete Seda
606	Email January 1, 2000, 2:37 p.m. P to Al Buthe
607	Photograph Pete Seda and Solomon Al Buthe under tree
608	Photograph Pete Seda, Rob Brown, John Dunn and David Rodgers
609	Photograph including Rob Brown, David Rodgers and Pete Seda
610	Photograph of 3800 South Highway 99 with camel
611	Photograph of cultural tent at 3800 South Highway 99
612	Photograph Al Haramain building
613	Photograph David Rodgers and King Abdullah
614-627	Reserved
628	December 2, 1999, article from NY TIMES " <i>McCain Urges Ending Aid To Russia In Wake Of Chechen Policy</i> "

Exhibit No.	Description
629	ABC News.com page, December 9, 1999, <i>"Yeltsin Lashes Out"</i>
630	THE INDEPENDENT web page December 11, 1999, <i>"In A Powerless, Frozen City Of No Food, The Blind Hear The Bombs And Know There Is No Escape; Sarah Richards Toured Chechnya's Capital As Russian Forces Closed In, And Was Among The Last To Leave."</i>
631	TIME webpage December 13, 1999, <i>"Campaign 2000: Foreign Policy: Where McCain Hits Bush The Hardest"</i>
632	Doctors Without Borders webpage December 15, 1999, <i>"Chechnya: The Tracking of Civilians"</i>
633	CNN.com webpage December 16, 1999, <i>"Albright Delivering 'strong message' to Russia"</i>
634	CNN.com webpage December 18, 1999, <i>"Russian Bombardment Intensifies As Troops Close On Grosny"</i>
635	Webpage THE GAZETTE, February 6, 2000, <i>"Escape From Chechnya"</i>
636(A)	Photographs Time.com photo essay, Russian Soldiers Rest in Downtown Grosny
636(B)	Blinded and Bound, Chechen Civilians
636(C)	Chechen Men in Pit
636(D)	Chechen Boy in Cellar
636(E)	Chechen Woman with Son
636(F)	Fallen City
637	CNN web page February 16, 2000, <i>"NATO, Russia Relax Tense Relations"</i>
638	Email February 21, 2000, 11:34 p.m. from the Arborist to B@qf.org
639	Article RIA NOVOSTI February 28, 2000, <i>"Saudi Arabia to Provide Humanitarian Aid For Refugees"</i>
640	Human Rights Watch Report February 29, 2000, <i>"War Crimes In Chechnya And The Response Of The West"</i>
641	CNN.com February 21, 2000 Russia Chechnya webpage, <i>"EU Says International Observers Needed In Chechnya"</i>

Exhibit No.	Description
642	Pages, March 22-31, 2000, CNN.com website
643	United Nations Foundation U.N. wire April 26, 2000, "U.N. Seeks Inquiry Into Violations In Chechnya"
644	MSF-USA special report, November 22, 2000, <i>Chechnya, The Politics Of Terror</i>
645	United Nations High Commissioner for Human Rights Resolution 2001/24
646	U.S. Senate Committee on Foreign Relations, Joseph R. Biden, February 12, 2004
647-656	Reserved
657	Email December 28, 1999, 4:26 p.m. from Info to Info@irw.org
658	Email January 7, 2000, 3:48 p.m. Info to Info@irw.org
659	Email January 12, 2000, 5:43 p.m. Info to Info@irw.org
660	Email January 27, 2000, 10:08 a.m. Info to Info@irw.org
661(A)	Email February 21, 2000, 10:49 a.m. Arborist to B@qf.org
661(B)	Web page Medecins Sans Frontieres
662(A)	Email February 21, 2000, 10:54 a.m. Arborist to B@qf.org
662(B)	Web page United Nations
663	Email April 2, 2001, 9:58 a.m. CIC@cicnow.com
664	Email September 21, 2001, 9:25 a.m. P to CAIR
665	Email September 21, 2001, 9:33 a.m. P to CIC@cicnow.com
666-668	Reserved
669	Email January 11, 2000, 14:38:08 S-El Fiki to Haramain
670	Email January 18, 2000, 07:34:27 Haramain to S. El Fiki
671	Email February 21, 2000, 9:12 a.m. head office to S. El Fiki
672	February 21, 2000, Letter Aqeel to El Fiki
673	February 24, 2000, Fax El Fiki to Nasir Eid National Bank of Kuwait

Exhibit No.	Description
674	English translation of February 24, 2000, Fax El Fiki to Nasir Eid National Bank of Kuwait
675	Declaration of Translation of February 24, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait
676	Email March 27, 2000, 8:36 a.m. Al Haramain to S. El Fiki
677	Letter April 13, 2000, Mahmoud T. El Fiki from National Bank of Kuwait
678	Redacted FBI 302 interview report of Mahmoud Talaat El Fiki, investigation on January 31, 2005
679	Kuwait Bank record for El Fiki
680-684	Reserved
685(A)	Email December 30, 1999, 8:50 p.m. P to Al Buthe
685(B)	Attachment to email Statement in Spanish and English from Ayuda Internacional Al Desplazado
686	Email January 22, 2000, 11:23 p.m. Ashland to Al Buthe
687-691	Reserved
692	Letter January 24, 2000, Pete Seda to Responsible Secretariat of Federation Committee for International Technical Humanitarian Cooperation
693	Email February 29, 2000, 12:16 p.m. P to B@qf.org
694	Memorandum March 1, 2000, Catherine Granel from Bilal Abdul-Kareem, "Aid to the People of Chechnya"
695	Email March 1, 2000, 12:22 a.m. P to B@qf.org
696	Email March 1, 2000, 10:55 a.m. Q to P@qf.org
697	Email March 1, 2000, 11:29 a.m. P to PJFlorin@jeffnet.org
698(A)	Email March 1, 2000, 12:28 p.m. P to Q
698(B)	Attachment to email, Memorandum to Catherine Granel, March 1, 2000
699-703	Reserved
704(A)	Al Haramain Islamic Foundation receipt #262740

Exhibit No.	Description
704(B)	English translation of Al Haramain Islamic Foundation receipt #262740
705(A)	Al Haramain receipt no. 263867
705(B)	English translation of Al Haramain receipt no. 263867
706(A)	Al Haramain log page of receipts no. 262740 & 263867
706(B)	English translation of Al Haramain log page of receipts no. 262740 & 263867
707(A)	Affidavit of Al Haramain Islamic foundation, executed May 3, 2004
707(B)	Certificate of translation of Affidavit of Al Haramain Islamic Foundation, executed May 3, 2004
707(C)	English translation Affidavit of Al Haramain Islamic foundation (707(A))
708-713	Reserved
714(A)	Diwan Presidency of Counsel of Ministers
714(B)	English translation of Diwan Presidency of Counsel of Ministers
715(A)	Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
715(B)	English translation of Diwan memo to His Royal Highness Minister of Interior re: Chechen Relief and SJRC
716(A)	Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
716(B)	English translation of Kingdom of Saudi Arabia, Saudi Joint Relief Committee (SJRC) for the Aid of the People of Kosovo
717(A)	Memo to his Excellency Minister of Finance and National Economy
717(B)	English translation of Memo to his Excellency Minister of Finance and National Economy
718(A)	Order of King Fahad Bin Abdulaziz Al-saud
718(B)	English translation of Order of King Fahad Bin Abdulaziz Al-saud
719(A)	Al Haramain Humanitarian Foundation memorandum November 4, 1999
719(B)	English translation of Al Haramain Humanitarian Foundation memorandum

Exhibit No.	Description
	November 4, 1999
720(A)	Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
720(B)	English translation of Telegram to the Minister of the Interior, re: Saudi Joint Committee November 10, 1999
721(A)	Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
721(B)	English translation of Minutes of meeting of the Chechnya Committee/Saudi Joint Relief Committee January 1, 2000
722(A)	Memo from Al Haramain Charity Foundation January 4, 2000
722(B)	English translation of memo from Al Haramain Charity Foundation January 4, 2000
723(A)	Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
723(B)	English translation of Report of Saudi Joint Relief Committee for Kosovo and Chechnya (Chechnya Committee) February 15, 2000
724(A)	Brief report what Chechnya Committee has achieved abroad
724(B)	English translation of brief report what Chechnya Committee has achieved abroad
725(A)	Declaration of Vladimir Matusevitch August 23, 2004
725(B)	Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya in Russian and Arabic
725(C)	English translation from Arabic of Memo of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
725(D)	English translation from Russian of Russian and Arabic language version of Accord between Russian Ministry and Saudi Joint Relief Committee for Kosovo and Chechnya
725(E)	Russian language version of Certificate 9927 of the State Registration Chamber
725(F)	English translation of Certificate 9927 of the State Registration Chamber

Exhibit No.	Description
726(A)	Telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
726(B)	English translation of telegram regarding Al Haramain, Chechnya and Saudi Joint Relief Committee June 2, 2003
727(A)	Telegram to Al Raji Banking and Investment Corporation March 14, 2004
727(B)	English translation of Telegram to Al Raji Banking and Investment Corporation March 14, 2004
728(A)	Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
728(B)	English translation of Confirmation from Minister of Justice regarding Al Haramain Islamic Foundation March 21, 2004
729(A)	Statement from Al Haramain Charity Foundation May 3, 2004
729(B)	English translation of Statement from Al Haramain Charity Foundation May 3, 2004
730	Unclassified summary regarding monies destined for needy Chechen families
731-747	Reserved
748	Handwritten document captioned "Wire Transfer" top line \$2767
749(A)	Email December 30, 1999 8:20 a.m. Tom to Pete Seda
749(B)	Proposal attachment to email: Letter Tom Wilcox to Pete Seda December 30, 1999
750	Engagement letter from Tom Wilcox to Pete Seda
751	Handwritten list, top line 2/24/2000 Mahmoud T. El Fiki
752	Check #9733 June 23, 2000
753	Check #9733 6/23/2000
754.1-?	Many of the documents in the file of Thomas Wilcox will be used as exhibit. Pursuant to agreement of the parties, this file was scanned by Pacific Legal Inc., and Bates numbered FPDUS0042234 - FPDUS0043706. The government has been provided with a complete copy of this file.

Exhibit No.	Description
755.1-?	A series of recovered Quikbook files (the number is not yet determined).
756	Email January 2, 2000, 1:13 p.m. P to Ms. Katkhouda
757	Email January 6, 2000, 1:35 a.m. Al Buthe to P
758	Email January 6, 2000, 1:37 a.m. Al Buthe to P
759	Email February 26, 2000, 8:45 a.m. from Al Buthe to P@qf.org
760-800	Reserved
801	Email April 1, 2000, 2:07 p.m. P to Raya Shokatford
802	Letter Proposal April 11, 2000, Pete Seda
803(A)	Email April 12, 2000, 11:57 a.m. PJFlorin@jeffnet.org to Pete Seda 3
803(B)	Draft greetings letter.doc attached to email
803(C)	Draft public relations letter re Islam attached to email
804(A)	Email April 18, 2000, 3:05 p.m. PJFlorin @jeffnet.org to Pete Seda 3
804(B)	Draft Jewish Community letter attached
804(C)	Draft anti-terrorism letter to Sheik Aqeel attached to April 11, 2000, email
805(A)	Email April 19, 2000 12:46 a.m. Ashland to Al Buthe
805(B)	Attachment to email, Letter April 19, 2000, Pete Seda to Aqeel al Aqeel
806	Letter April 19, 2000, Pete Seda to Aqeel al Aqeel
807	Email July 5, 2000, 11:52 a.m. PJFlorin@jeffnet.org to Pete Seda and attachment
808	ASHLAND DAILY TIDINGS September 15, 2001
809	Letter September 18, 2001, Al Haramain Foundation, signed by Pete Seda, to Office of Emergency Relief, City of New York
810	Letter September 18, 2001, Pete Seda to State Department
811	Letter September 18, 2001, Pete Seda to Office of Emergency Relief
812	Letter September 20, 2001, Pete Seda to My Dear Brothers and Sisters
813	Letter September 20, 2001, Secretary of Health and Human Services,

Exhibit No.	Description
	Tommy Thompson, from Pete Seda
814	Mail Tribune article, September 20, 2001
815	Letter to the Editor by Pete Seda, September 21, 2001
816	Email September 21, 2001, 9:15 p.m. Marisa Petersen to Qu'ran Foundation
817	September 23, 2001, 10:59 a.m. A to letters@tucsoncitizen.com
818	September 23, 2001, 6:45 p.m. A to Oelrichs@rockymountainnews.com
819	September 23, 2001, 7:31 p.m. A to letters@washpost.com
820(A)	September 26, 2001, 11:04 a.m. Florin to Pete Seda
820(B)	Email September 26, 2001, Pete Seda to Senator Wyden
821	Letter October 2, 2001, Congressman Greg Walden to Pete Seda
822	Letter October 2, 2001, Pete Seda to Dear Spiritual Leader
823	Letter October 5, 2001, FBI Thomas J. Pickard to Pete Seda
824	Email October 7, 2001, 2:28 p.m. The Arborist to Traci Dow
825	Email October 7, 2001, 3:05 p.m. A to DBerger and attachment
826	Email October 14, 2001, 1:16 p.m. Scarlet Ledesma to Pete@the arborist.com
827	Reserved
828	Letter October 24, 2001, Department of the Army, Office of Chief of Chaplins, to Pete Seda
829	Letter November 19, 2001, Federal Bureau of Investigation to Pete Seda
830	Email November 27, 2001, 2:57 pm, from Peace House to recipient list
831	Email November 28, 2001, 7:58 am, Victoria Lane to P at QF.org
832	Announcement of community benefit concert Saturday, December 1, 2001
833	Press releases March 2002
834	Press Release March 11, 2002, by Al Haramain Islamic Foundation

Exhibit No.	Description
835	Letter March 15, 2002, Pete Seda to Senator Joseph Biden
836(A)	Email October 14, 2002, from Florin to Pete Seda
836(B)	Attachment to Email October 14, 2002, Florin to Pete Seda, Letter Pete Seda to scholars of the Ummah
837	Reserved
838	Letter November 4, 2002, Pete Seda to Brothers in Al Haramain Islamic Foundation
839	Letter 10 th of Sha (ban 1423) (October 16, 2002) Pete Seda to Scholars of the Ummah
840	Memo January 28, 2003, Secretary of State Powell from Pete Seda
841-51	Reserved
852	Letter November 19, 2001, Barbara S. Wallace, Federal Bureau of Investigation, to Pete Seda
853	Letter February 14, 2002, United States Department of Justice, Criminal Division, to Pete Seda
854	Letter July 2, 2002, Pete Seda to Dave Carroll
855(A)	Reserved
855(B)	Reserved
856	Photograph of Pete Seda with United States Ambassador to United Arab Emirates, Michele J. Sison
857-865	Reserved
866	Letter April 22, 2002, Pete Seda to Israeli Embassy
867	Letter April 22, 2002, Pete Seda to Licensing Division, Office of Foreign Assets Control
868(A)	Email April 22, 2002, P to Florin 4:43 pm
868(B)	Attached letter to Israeli's 4/22/02
869	Email 4/23/2002 8:19 am, Brett Schor to P
870	Letter May 2, 2002, Ambassador Kurtzer to Pete Seda

Exhibit No.	Description
871	Emails May 13,2002, PS to Benny Dagan
872	Letter May 14, 2002, Pete Seda to Lorraine Lanlor, Office of Foreign Assets Control
873	Letter May 14, 2002, Pete Seda to Compliance Division Office of Foreign Assets Control
874(A)	Email May 28, 2002, PS to Florin
874(B)	Letter May 28, 2002, Pete Seda to Earl Wall
875	Letter June 19, 2002, Office of Foreign Assets Control to Martin McMahon, Esquire
876	Letter July 1, 2002, Pete Seda to Richard Newcomb, Office of Foreign Assets Control
877(A)	Email July 2, 2002, David Berger to Pete Seda
877(B)	Letter July 2, 2002, to Chief Pete Flueter
877(C)	Letter July 2, 2002, to Lieutenant Patten
878	Letter July 16, 2002, Pete Seda to Israeli Colonel Isaac Gurvich
879	Letter July 17, 2002, Pete Seda to Ambassador Kurtzer
880	Letter July 17, 2002, Pete Seda to United States Embassy, Economics Section, Ava Rogers
881	Letter July 17, 2002, Pete Seda to Deborah Schwartz, United States Embassy, Israel
882	Fax July 22, 2002, Ava Rogers, U.S. Embassy to Pete Seda
883(A)	Email July 22, 2002, Florin to PS 11:24 am
883(B)	Letter July 22, 2002, Pete Seda to Ava Rogers, U.S. Embassy
884	Letter July 23, 2002, Pete Seda to Ian Barukh, Israeli Foreign Ministry
885	Letter July 26, 2002, Rabbi Zaslow
886(A)	Email July 30, 2002, PS to Asim.ghafoor 2:28 p.m.
886(B)	Letter Israeli government July 28, 2002

Exhibit No.	Description
887	Fax July 31, 2002, Leah Tesmel to Pete Seda
888	Letter Pete Seda to Ms. Orley, Israel Defense Forces
889	Email August 27, 2002, Florin to PS, with email from PS to Florin
890-905	Reserved
906	Email February 21, 2000, 8:50 p.m. wsra99@aol.com to P@qf.org,
907	Email March 29, 2000, 10:32 a.m. P to wsra99@aol.com
908(A)	Email October 26, 2001, 4:48 p.m. Sandra Kay to Pete
908(B)	Attached letter, October 26, 2001, to Steve Monroe at OFAC
909(A)	Letter November 1, 2001, Pete Seda to Emily Clay at OFAC
909(B)	Letter November 2, 2001, OFAC to Pete Seda
910-924	Reserved
925	Photo Pete Seda with truck
926	Article REGISTER GUARD, " <i>Fate of Big Leaf Maples in Whiteaker Up In The Air</i> "
927	Email January 20, 2000, 7:41 p.m. Brad and Rooney Riggs to P
928	Email February 11, 2000, 6:56 p.m. Jim Hartman to Pete
929	Ashland Watershed Partnership meeting notes March 28, 2000
930	Email November 17, 2000, 3:08 p.m.: Swales to @mind.net
931	Email April 11, 2001, 11:56 a.m. Rose Hill to P@qf.org
932	Email June 24, 2001, 2:13 p.m. The Arborist to Colin Swales
933(A)	Email October 17, 2001, Representative Greg Walden to Pete
933(B)	Email December 6, 2001, Representative Greg Walden to Pete
934	Photograph Pete Seda cleaning Ashland
935	Pete Seda on ladder
936	Pete Seda cleaning with fire people

Exhibit No.	Description
937	Photograph of the arborist crew
938	Photograph of Pete Seda with Governor Kitzhaber
939	Photograph of Pete Seda cleaning downtown Ashland
940-955	Reserved
956	Photo Pete Seda with children
957(A)	Email March 28, 2000, 3:25 p.m. Q to P@qf.org
957(B)	March 28, 2000, letter Pete to Pastor
958	Email May 23, 2000, 3:20 p.m. B to P
959	Email October 22, 2000, 8:57 p.m. Kelly Bennett to Pete Sedaghaty
960	Email January 24, 2001, 12:14 a.m. P to Shalomrav@aol.com
961	Email February 23, 2001, 1:56 p.m. Stan Way to P@qf.org
962	Email May 11, 2001, 10:12 a.m. James Y. Horton to P@qf.org
963	Email May 21, 2001, 2:22 p.m. Pam Long to P@qf.org
964	Email May 22, 2001, 11:31 a.m. Peace House to Pete Seda et. al.
965	Email July 2, 2001, 12:53 a.m. Pete to BLJ_maj@yahoo.com
966	MAIL TRIBUNE article: <i>Class Tries To Bridge The Ignorance Gap</i> , October 10, 2001
967	Photograph class at tent
968	Photograph multi-cultural fair
969	Photograph Religion Class at tent
970	Photograph presentation at church
971	Email Jane Claussen to P at QF.org, January 2, 2002
972(A)	Email January 21, 2002, 1:50 pm, P to Florin
972(B)	Attachment letter for Peace House
973	Bi-line article: Islamic Show Intrigues RCC, February 2002

Exhibit No.	Description
974	Email February 1, 2002, Drake, Tommy to P at QF.org, 10:47 am
975	Email February 5, 2002, Closter, Larry to Q. (six pages)
976	Photograph Pete Seda in church
977	Photograph of Pete Seda lecturing to students
978-986	Reserved
987	Email April 11, 2000, 8:13 a.m. B to P@qf.org
988	Email March 13, 2002, Stan Way to P
989(A)	Email April 19,2002, P to Florin
989(B)	Attached letter to Senators and Reps
990	Booklet Islam Is by Pete Seda
991	T-shirt
992-1001	Reserved
1002	Summary of seized videos and other media (to be created)
1003	Summary of review of prisoner letters (to be created)
1004-1023	Reserved
1024	Photograph of shrubbery
1025(A)	Photograph of wire
1025(B)	Photograph of wire

Exhibit No.	Description
1026	Photograph of former President George W. Bush with Saudi Crown Prince Abdullah

RESPECTFULLY SUBMITTED this 30th day of March, 2010.

/s/ Steven T. Wax

Steven T. Wax
Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar